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*Attorneys for Defendant/Counterclaim-
Plaintiff, Mileutis Ltd.*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

INTERVET, INC.,

Plaintiff/Counterclaim-Defendant,

v.

MILEUTIS LTD.,

Defendant/Counterclaim-Plaintiff.

Civil No.: 15-CV-1371 (FLW)(TJB)

**DECLARATION OF
GREGORY D. MILLER**

Gregory D. Miller declares pursuant to 28 U.S.C. § 1746:

1. I am a partner at the law firm of Rivkin Radler LLP, counsel for Defendant/Counterclaim-Plaintiff Mileutis Ltd. (“Mileutis”) in the above-referenced matter. As such, I have personal knowledge of the facts set forth herein.

2. I submit this Declaration in support of Mileutis’ motion, pursuant to Local Civil Rule 5.3(c), for an Order sealing the Confidential Information contained in Mileutis’ Local Rule 7.1.1 Disclosure Statement (D.E. 126) (hereinafter referred to as the “Confidential Material”).

3. This is a commercial dispute involving the disclosure of highly sensitive, proprietary business information. The information Mileutis seeks to seal is related to Mileutis’ sensitive financial and proprietary business information and confidential business dealings as well

as sensitive internal company information that is of a highly confidential and sensitive nature, the disclosure of which would be detrimental to Mileutis' interests in protecting such information. The public interest in the confidential business dealings and sensitive information is negligible, and the Confidential Information will not be used to determine the parties' substantive legal rights in this matter. Mileutis' request is made pursuant to the Amended Stipulated Discovery Confidentiality Order entered by the Honorable Tonianne J. Bongiovanni, U.S.M.J. (D.E. 55), which is annexed hereto as **Exhibit A**.

4. I attach hereto as **Exhibit B** a table identifying the document containing the confidential information requested to be sealed, and further explaining Mileutis' position regarding the following: (a) the nature of the materials or proceedings at issue; (b) the legitimate private or public interests, which warrant the relief sought; (c) the clearly defined and serious injury that would result if the relief sought is not granted; (d) why a less restrictive alternative to the relief sought is not available; (e) whether there any prior orders sealing the same materials in the pending action; and (f) the parties' positions concerning the request to seal.

5. Intervet consents to the sealing of D.E. 126 in its entirety.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 19, 2021

s/ Gregory D. Miller
Gregory D. Miller